

CLOSED,TYPE-I

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:16-cv-00751-RMC**

AGRAMA v. INTERNAL REVENUE SERVICE  
Assigned to: Judge Rosemary M. Collyer  
Cause: 05:552 Freedom of Information Act

Date Filed: 04/22/2016  
Date Terminated: 10/23/2017  
Jury Demand: None  
Nature of Suit: 895 Freedom of  
Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff**

**JEHAN AGRAMA**

represented by **Dennis L. Perez**  
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*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

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V.

**Defendant**

**INTERNAL REVENUE SERVICE**

represented by **Stephanie Ann Sasarak**  
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Tax Division  
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*LEAD ATTORNEY*  
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Date Filed	#	Docket Text
04/22/2016	<u>1</u>	COMPLAINT against INTERNAL REVENUE SERVICE ( Filing fee \$ 400 receipt number 0090-4497356) filed by JEHAN AGRAMA. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit D, # <u>5</u> Exhibit E, # <u>6</u> Exhibit F, # <u>7</u> Exhibit G, # <u>8</u> Civil Cover Sheet, # <u>9</u> Notice of Related Case, # <u>10</u> Summons to IRS, # <u>11</u> Summons to USA-DC, # <u>12</u> Summons to USAG)(Rizek, Christopher) Modified on 4/25/2016 (sth). (Entered: 04/22/2016)
04/22/2016		Case Assigned to Judge Rosemary M. Collyer. (sth) (Entered: 04/25/2016)
04/25/2016	<u>2</u>	SUMMONS (3) Issued Electronically as to INTERNAL REVENUE SERVICE, U.S. Attorney and U.S. Attorney General (Attachments: # <u>1</u> Summons, # <u>2</u> Summons, # <u>3</u> Summons)(sth) (Entered: 04/25/2016)
04/28/2016	<u>3</u>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name- Dennis L. Perez, :Firm- Hochman, Salkin, Rettig, Toscher & Perez, P.C., :Address- 9150 Wilshire Blvd., Suite 300, Beverly Hills, CA 90212. Phone No. - (310) 281-3240. Fax No. - (310) 859-1430 Email - perez@taxlitigator.com Filing fee \$ 100, receipt number 0090-4504939. Fee Status: Fee Paid. by JEHAN AGRAMA (Attachments: # <u>1</u> Certification in Support)(Rizek, Christopher) (Entered: 04/28/2016)
04/29/2016		MINUTE ORDER granting <u>3</u> Motion for Leave to Appear Pro Hac Vice. Dennis Perez may appear pro hac vice for Plaintiff. Signed by Judge Rosemary M. Collyer on 4/29/2016. (KD) (Entered: 04/29/2016)
08/01/2016	<u>4</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 7/13/2016. Answer due for ALL FEDERAL DEFENDANTS by 8/12/2016. (Rizek, Christopher) (Entered: 08/01/2016)
08/01/2016	<u>5</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General 07/13/2016. (Rizek, Christopher) (Entered: 08/01/2016)
08/01/2016	<u>6</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. INTERNAL REVENUE SERVICE served on 7/13/2016 (Rizek, Christopher) (Entered: 08/01/2016)
08/12/2016	<u>7</u>	ANSWER to Complaint by INTERNAL REVENUE SERVICE.(Sasarak, Stephanie) (Entered: 08/12/2016)
08/15/2016		MINUTE ORDER requiring the parties to file a joint proposed briefing schedule on dispositive motions no later than <u>August 26, 2016</u> . Signed by Judge Rosemary M. Collyer on 8/15/2016. (lcrmc1) (Entered: 08/15/2016)
08/15/2016		Set/Reset Deadlines/Hearings: Joint proposed briefing schedule due by 8/26/2016. (cdw) (Entered: 08/15/2016)
08/26/2016	<u>8</u>	PROPOSED BRIEFING SCHEDULE re Order by INTERNAL REVENUE SERVICE. (Sasarak, Stephanie) (Entered: 08/26/2016)
08/26/2016		MINUTE ORDER approving <u>8</u> Joint Proposed Briefing Schedule. The parties shall file a joint status report no later than <u>September 16, 2016</u> . Signed by Judge Rosemary M. Collyer on 8/26/2016. (lcrmc1) (Entered: 08/26/2016)
09/16/2016	<u>9</u>	Joint STATUS REPORT <i>And Proposed Briefing Schedule</i> by INTERNAL REVENUE SERVICE. (Sasarak, Stephanie) (Entered: 09/16/2016)
09/16/2016		ORDER approving proposed briefing schedule. Defendant shall file its Motion for Summary Judgment no later than November 1, 2016. Plaintiff shall file her Opposition to Motion for Summary Judgment and Cross Motion for Summary Judgment no later than December 1, 2016. Defendant shall file its Reply in Support of Motion for Summary Judgment and Opposition to Cross Motion for Summary Judgment no later than December 15, 2016. Plaintiff shall file her Reply in Support of Cross Motion for Summary Judgment no later than December 30, 2016. Signed by Judge Rosemary M. Collyer on 9/16/2016. (DAS) (Entered: 09/16/2016)

09/16/2016		Set/Reset Deadlines/Hearings: Summary Judgment motion due by 11/1/2016. Response to Motion for Summary Judgment due by 12/1/2016. Reply to Motion for Summary Judgment due by 12/15/2016. Cross Motion due by 12/1/2016. Response to Cross Motion due by 12/15/2016. Reply to Cross Motion due by 12/30/2016. (cdw) (Entered: 09/16/2016)
11/01/2016	<u>10</u>	MOTION for Summary Judgment by INTERNAL REVENUE SERVICE (Attachments: # <u>1</u> Memorandum in Support, # <u>2</u> Statement of Facts, # <u>3</u> Affidavit Coen Declaration, # <u>4</u> Affidavit Lepore Declaration, # <u>5</u> Affidavit Valvardi Declaration, # <u>6</u> Text of Proposed Order)(Sasarak, Stephanie) (Entered: 11/01/2016)
12/01/2016	<u>11</u>	Memorandum in opposition to re <u>10</u> MOTION for Summary Judgment of the Internal Revenue Service filed by JEHAN AGRAMA. (Attachments: # <u>1</u> Declaration, # <u>2</u> Exhibit, # <u>3</u> Statement of Facts)(Perez, Dennis) (Entered: 12/01/2016)
12/01/2016	<u>12</u>	Cross MOTION for Summary Judgment by JEHAN AGRAMA (Attachments: # <u>1</u> Text of Proposed Order)(Perez, Dennis) (Entered: 12/01/2016)
12/01/2016	<u>13</u>	SEALED MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL filed by JEHAN AGRAMA (This document is SEALED and only available to authorized persons.) (Attachments: # <u>1</u> Exhibit 1 of Declaration of Dennis L. Perez, # <u>2</u> Exhibit 3 of Declaration of Dennis L. Perez, # <u>3</u> Text of Proposed Order)(Perez, Dennis) (Entered: 12/01/2016)
12/01/2016	<u>14</u>	NOTICE that Exhibits 1 and 3 of the Perez Declaration are Lodged Under Seal by JEHAN AGRAMA (Perez, Dennis) (Entered: 12/01/2016)
12/02/2016		MINUTE ORDER granting <u>13</u> Sealed Motion for Leave to File Document Under Seal. Signed by Judge Rosemary M. Collyer on 12/2/2016. (lcrmc1) (Entered: 12/02/2016)
12/05/2016	<u>15</u>	SEALED DOCUMENT (Exhibits 1 and 3) filed by JEHAN AGRAMA. (This document is SEALED and only available to authorized persons.) (Attachments: # <u>1</u> Exhibit 3 of Declaration of Dennis L. Perez)(znmw) (Entered: 12/05/2016)
12/13/2016	<u>16</u>	Unopposed MOTION for Extension of Time to File Response/Reply And Reset Deadlines by INTERNAL REVENUE SERVICE (Attachments: # <u>1</u> Text of Proposed Order)(Sasarak, Stephanie) (Entered: 12/13/2016)
12/13/2016		MINUTE ORDER granting <u>16</u> Motion for Extension of Time to File Response/Reply. Defendant shall file its Reply in Support of Motion for Summary Judgment and Opposition to Cross Motion for Summary Judgment no later than December 22, 2016. Plaintiff shall file her Reply in Support of Cross Motion for Summary Judgment no later than January 9, 2017. Signed by Judge Rosemary M. Collyer on 12/13/16. (lcrmc1) (Entered: 12/13/2016)
12/13/2016		Set/Reset Deadlines/Hearings: Defendant's reply to Motion for Summary Judgment due by 12/22/2016. Defendant's response to Cross Motion due by 12/22/2016. Plaintiff's reply to Cross Motion due by 1/9/2017. (cdw) (Entered: 12/14/2016)
12/22/2016	<u>17</u>	REPLY to opposition to motion re <u>10</u> MOTION for Summary Judgment filed by INTERNAL REVENUE SERVICE. (Attachments: # <u>1</u> Response to Plaintiff's Statement of Undisputed Material Facts)(Sasarak, Stephanie) (Entered: 12/22/2016)
12/22/2016	<u>18</u>	Memorandum in opposition to re <u>12</u> Cross MOTION for Summary Judgment filed by INTERNAL REVENUE SERVICE. (Attachments: # <u>1</u> Response to Plaintiff's Statement of Undisputed Material Facts)(Sasarak, Stephanie) (Entered: 12/22/2016)
01/06/2017	<u>19</u>	REPLY TO DEFENDANT'S RESPONSE TO PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT filed by JEHAN AGRAMA. (Perez, Dennis) (Entered: 01/06/2017)
01/13/2017	<u>20</u>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name– Evan J. Davis, :Firm– Hochman, Salkin, Rettig, Toscher & Perez, P.C., :Address– 9150 Wilshire Blvd., Suite 300, Beverly Hills, CA 90212. Phone No. – (310) 281–3288. Fax No. – (310) 859–1430 Email – davis@taxlitigator.com Filing fee \$ 100, receipt number 0090–4806675. Fee Status: Fee Paid. by JEHAN AGRAMA (Attachments: # <u>1</u> Certification in Support)(Rizek, Christopher) (Entered: 01/13/2017)

01/17/2017		MINUTE ORDER granting <u>20</u> Motion for Leave to Appear Pro Hac Vice as to Attorney Evan J. Davis. Signed by Judge Rosemary M. Collyer on 1/17/2017. (lcrmc1) (Entered: 01/17/2017)
02/10/2017	<u>21</u>	MOTION to Amend/Correct <i>Reply in Support of Plaintiff's Cross-Motion for Summary Judgment</i> by JEHAN AGRAMA (Attachments: # <u>1</u> Declaration of Dennis L. Perez, # <u>2</u> Exhibit 5 of Dennis L. Perez Declaration)(Perez, Dennis) (Additional attachment(s) added on 2/13/2017: # <u>3</u> Amended Reply, # <u>4</u> Text of Proposed Order) (znmw). (Entered: 02/10/2017)
02/10/2017	<u>22</u>	ENTERED IN ERROR.....REPLY <i>In Support of Plaintiff's Cross-Motion for Summary Judgment</i> filed by JEHAN AGRAMA. (Attachments: # <u>1</u> Text of Proposed Order)(Perez, Dennis) Modified on 2/13/2017 (znmw). (Entered: 02/10/2017)
02/13/2017		NOTICE OF ERROR re <u>22</u> Reply to Document; emailed to perez@taxlitigator.com, cc'd 6 associated attorneys --- The PDF file you docketed contained errors: 1. Leave to file not yet requested and/or granted, 2. ENTERED IN ERROR as a separate docket entry; the proposed amended reply will be added as an exhibit to the motion <u>21</u> and will be refiled when/if the motion is granted. (znmw, ) (Entered: 02/13/2017)
02/23/2017	<u>23</u>	Memorandum in opposition to re <u>21</u> MOTION to Amend/Correct <i>Reply in Support of Plaintiff's Cross-Motion for Summary Judgment</i> filed by INTERNAL REVENUE SERVICE. (Attachments: # <u>1</u> Exhibit)(Sasarak, Stephanie) (Entered: 02/23/2017)
03/02/2017	<u>24</u>	REPLY to opposition to motion re <u>21</u> MOTION to Amend/Correct <i>Reply in Support of Plaintiff's Cross-Motion for Summary Judgment</i> filed by JEHAN AGRAMA. (Perez, Dennis) (Entered: 03/02/2017)
03/28/2017	<u>25</u>	ORDER granting <u>21</u> Motion to Amend/Correct. The Clerk of the Court is hereby directed to file Plaintiffs Amended Motion [Dkt. 21-3], the Declaration of Dennis Perez in Support thereof [Dkt. 21-1], and Exhibit 5 attached to the Declaration of Dennis Perez [Dkt.21-2]. Signed by Judge Rosemary M. Collyer on 3/28/2017. (lcrmc1) (Entered: 03/28/2017)
03/28/2017	<u>26</u>	AMENDED REPLY to opposition to motion re <u>12</u> Cross MOTION for Summary Judgment filed by JEHAN AGRAMA. (Attachments: # <u>1</u> Declaration of Dennis L. Perez, # <u>2</u> Exhibit 5 of Dennis L. Perez Declaration)(znmw) (Entered: 03/29/2017)
03/31/2017	<u>27</u>	MOTION for Leave to File <i>Documents for the Court's In Camera Review</i> by INTERNAL REVENUE SERVICE (Attachments: # <u>1</u> Text of Proposed Order)(Sasarak, Stephanie) (Entered: 03/31/2017)
04/06/2017	<u>28</u>	Memorandum in opposition to re <u>27</u> MOTION for Leave to File <i>Documents for the Court's In Camera Review</i> filed by JEHAN AGRAMA. (Davis, Evan) (Entered: 04/06/2017)
06/23/2017	<u>29</u>	ORDER granting Defendant's <u>27</u> Motion for Leave to File Documents for the Court's In Camera Review. Defendant is further ordered to deliver to chambers for the Court's in camera review no more than one declaration and one addendum brief by July 14, 2017. Signed by Judge Rosemary M. Collyer on 6/23/2017. (lcrmc1) (Entered: 06/23/2017)
06/23/2017		Set/Reset Deadlines/Hearings: Defendant's In-Camera Submission due by 7/14/2017. (cdw) (Entered: 06/26/2017)
07/13/2017	<u>30</u>	NOTICE of Compliance by INTERNAL REVENUE SERVICE re <u>29</u> Order on Motion for Leave to File, (Sasarak, Stephanie) (Entered: 07/13/2017)
10/20/2017	<u>31</u>	MEMORANDUM AND OPINION. Signed by Judge Rosemary M. Collyer on 10/20/2017. (lcrmc1) (Entered: 10/20/2017)
10/20/2017	<u>32</u>	ORDER granting Defendant's <u>10</u> Motion for Summary Judgment and denying Plaintiff's <u>12</u> Cross-Motion for Summary Judgment. Judgment is entered in favor of Defendant on all counts. This case is closed. Signed by Judge Rosemary M. Collyer on 10/20/2017. (lcrmc1) (Entered: 10/20/2017)